

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

| | | | |
|---------------------------|---|----------|------------------|
| In Re: |) | Case No: | 19-09205 |
| Jeffrey Gemini |) | | |
| Michelle Christine Gemini |) | Chapter: | Chapter 13 |
| Debtor, |) | | |
| |) | Judge: | LaShonda A. Hunt |

NOTICE OF MOTION

To: Jeffrey Gemini, 1315 Cumberland Cir W , Elk Grove Village, IL, 60007

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **Monday April 15, 2019 at 9:00 a.m.**, I shall appear before the Honorable Judge LaShonda A. Hunt in 219 S. Dearborn St. # 719, , Chicago, IL and then and there present the attached **Motion to Extend the Automatic Stay**, a copy of which is attached hereto.

By: Scott Justin Greenwood
Scott Justin Greenwood

CERTIFICATE OF SERVICE

I, Scott Justin Greenwood, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Suite 3400, Chicago, Illinois, on April 5, 2019.

By: /s/ Scott Justin Greenwood
Scott Justin Greenwood

Attorneys for the Debtors

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960

Alliance Collection Agencies
PO BOX 1267
Marshfield WI 54449

Americash Loans LLC
PO BOX 1728
Des Plaines IL 60017

Bank of America
PO BOX 982284
El Paso TX 79998

Barclays Bank Delaware
PO BOX 8801
Wilmington DE 19899

Capital One Bank
Bankruptcy Department
PO Box 60024
City Of Industry CA 91716

Clerk, Third Mun Div
18M3456
2121 Euclid Ave #121
Rolling Meadows IL 60008

Blitt and Gaines, PC
18M3456
661 Glenn Ave.
Wheeling IL 60090

Capital One Bank (USA) NA
By American InforSource as agent
PO BOX 71083
Charlotte NC 28272

Capital One
Bankruptcy Dept.
PO Box 30285
Salt Lake City UT 84130

Chase CARD
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington DE 19850

Chase Card Services
PO BOX 15295
Wilmington DE 19850

Cutler & Associates
4131 Main Street
Skokie IL 60076

Discover Financial
PO BOX 3025
New Albany OH 43054

First National Bank
PO BOX 5097
Sioux Falls SD 57117

First Premier Bank
PO BOX 5524
Sioux Falls SD 57117

First Savings Bank
PO BOX 5096
Sioux Falls SD 57117

Ford Motor Credit Company LLC
PO BOX 62180
Colorado Springs CO 80962

Ford Motor Credit Company LLC
PO BOX 62180
Colorado Springs CO 80962

CT CORPORATION SYSTEM
Registered Agent For Ford Motor
Credit Company LLC
Attn: Bankruptcy Department
208 SO LASALLE ST, SUITE 814
Chicago IL 60604

Illinois Department of Revenue
Bankruptcy Department
PO Box 19035
Springfield IL 62794-9044

Illinois Department of Revenue
Bankruptcy Department
PO Box 19044
Springfield IL 62794-9044

IRS Non-Priority
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

Jefferson Capital Systems LLC
PO BOX 7999
Saint Cloud MN 56302

John Olson
C/o John Kightlinger
224 Wimbolton Drive
Mount Prospect IL 60056

Lending CLUB CORP
Attn: Bankruptcy Dept.
71 Stevenson St Ste 300
San Francisco CA 94105

Merrick BANK CORP
Attn: Bankruptcy Dept.
Po Box 9201
Old Bethpage NY 11804

Merrick Bank
Resurgent Capital services
PO BOX 10368
Greenville SC 29603

Opportunity Financial LLC
130 E. Randolph Street
Suite 3400
Chicago IL 60601

Premier Bankcard, LLC
Jefferson Cap Systems LLC Assigne

PO BOX 7999
Saint Cloud MN 56302

Quantum3 group LLC as agent for
Credit Corp Solutions Inc
PO BOX 788
Kirkland WA 98083

Synchrony Bank
C/o Weinstein & Riley PS
2001 Western Ave Suite 400
Seattle WA 98121

Synchrony Bank/Walmart
PO BOX 965060
Orlando FL 32896

Webbank/Fingerhut
Attn: Bankruptcy Dept.
6250 Ridgewood Rd
Saint Cloud MN 56303

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

| | | |
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| In Re: Jeffrey Gemini Michelle Christine Gemini Debtor, |))))) | Case No: 19-09205 Chapter: Chapter 13 Judge: LaShonda A. Hunt |
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MOTION TO EXTEND THE AUTOMATIC STAY

NOW COME the Debtors, Mr. & Mrs. Jeffrey Gemini (the “Debtors”), by and through their attorneys, Geraci Law LLC, to present their **Motion to Extend the Automatic Stay** pursuant to 11 U.S.C. §§. 105 and 362(c)(3), and state as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b).
2. The Debtors filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 03/29/2019.
3. The Debtors filed a previous petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code on 08/19/2018, case number 18-23397. The case was dismissed on Trustee’s motion on 02/25/2019 for unreasonable delay.
4. The Debtors’ circumstances have changed as follows (see affidavit attached as Exhibit A):
 - a. Debtors’ prior case was filed with six payment steps, both up and down; Debtors were prepared to make these payments. However, after case filing, Debtor’s bankruptcy plan was amended in eight separate sections including the payment steps in 2.1. This created a situation where, without any real ability to adjust expenditures with such little notice, Debtors were unable to stay current in payments.

- b. Debtors' current case will succeed where the prior did not because they now have a budget that is accurate and payment steps that are properly calculated to align with the ending of 401k loans. Additionally, in this case Debtors agreed to make payment via payroll control whereas in the prior case they did not.
5. The Debtors are filing this case in good faith.
6. The schedules I and J of the previous case have been attached as Exhibit B, the schedules I and J of the current case have been attached as Exhibit C.

WHEREFORE, the Debtors, Mr. & Mrs. Jeffrey Gemini, pray this Court enter an order:

1. Extending the Automatic Stay as to all creditors until such time as the stay is lifted by a party in interest as to that party only following notice and a hearing or such time as this case is dismissed or discharged; and
2. Any other relief that this Court deems just and proper.

Respectfully submitted,

/s/ Scott Justin Greenwood
Scott Justin Greenwood

Attorneys for the Debtors

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960